

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE MOL GLOBAL, INC. SECURITIES
LITIGATION

No. 14-Civ-9357 (WHP)

ECF Case

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR FINAL APPROVAL OF PROPOSED
CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's May 20, 2016 Preliminary Approval Order preliminarily approving the proposed settlement and approving notice to the class, *inter alia*, and upon the accompanying: (i) Declaration of Ira M. Press in Support of Final Approval of the Proposed Class Action Settlement, Plan of Allocation, Award of Attorneys' Fees and Expenses, and Reimbursement of Litigation Expenses, dated August 12, 2016; (2) the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation; (iii) Affidavit of Jose C. Fraga Regarding Mailing of the Notice and Proof of Claim and Release; Publication of the Summary Notice; Telephone Helpline; Website; and Requests for Exclusion, dated August 10, 2016; and (iv) all other papers and proceedings herein, Lead Plaintiff Lembaga Tabung Amanah Pekerja (the "TAP Retirement Fund") will and does hereby move this Court, before the Honorable William H. Pauley III, on September 16, 2016, at 11:00 a.m. in Courtroom 20B of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, or such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and for entry of an Order approving the proposed Plan of Distribution as fair and reasonable. A copy of the [Proposed] Final Judgment and Order of Dismissal with Prejudice, which was previously filed on

April 12, 2016 in connection with the Preliminary Approval Motion (ECF No. 102-6), is attached hereto.

Dated: August 12, 2016

Respectfully submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press
Ira M. Press
Daniel Hume
Meghan J. Summers
825 Third Avenue, 16th Floor
New York, NY 10022
Telephone: (212) 371-6600
Facsimile: (212) 751-2540

Lead Counsel for Class and Counsel for Lead Plaintiff TAP Retirement Fund